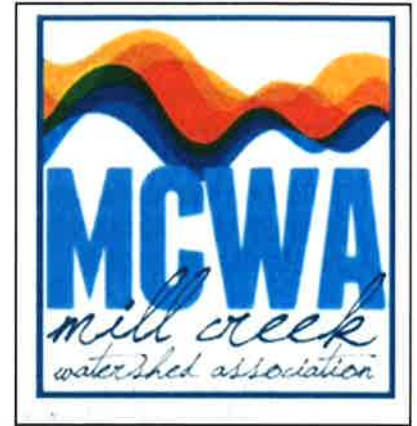


April 12, 2017

Ms. Tisha Calabrese Benton
Director, Division of Water Resources
Tennessee Department of Environment & Conservation
312 Rosa L. Parks Ave – Tennessee Tower – 11th Floor
Nashville, TN 37243-1102

Re: NRS16.124
Mill Creek Watershed, Davidson County, Tennessee



Ms. Benton,

The Mill Creek Watershed Association requests a hearing with the board of directors to appeal the permit issued to NRS16.124 for the proposed hotel development at 608 & 610 McGavock Pike.

The site in question has two significant hydrological features: a natural spring and wetlands. The MCWA met previously with the development team and TDEC representatives to discuss plan alternatives. The MCWA clearly expressed concerns to protect the dwindling wetlands areas within the Mill Creek watershed. Since these meetings, TDEC has issued a permit to allow construction to proceed. The MCWA feels that the hydrological features on this site are worth preserving at all costs.

During previous meetings with the development team and TDEC, the MCWA discussed a number of options that would include not only protecting the existing spring, but would add other green features to the project such as permeable pavement in the parking areas or reducing the parking area to increase the size of the protected wetland. Following the development team responded to say that the hotel franchise will not allow such changes to the parking lot. The development did not offer any alternatives for green infrastructure, such as rain gardens.

The current plans do not reflect the agreed upon requests of the MCWA. We are concerned that the development team is more concerned with reducing construction costs over environmental impacts.

The MCWA requests that TDEC reconsiders the impacts of the proposed construction. While we advocate strongly for no development within the wetlands, the MCWA would accept a plan that includes the following conditions:

- Protect the offsite spring with a vegetated buffer, per Metro Stormwater regulations.
- Replace the proposed 24" CMP with an open bottom box culvert to reduce the impact on the flow from the spring to Sims Branch.
- Additional green infrastructure elements, including
 - Roof drains tied to rain gardens in parking areas
 - Permeable pavements
 - Grassed drainage swales
 - Shade trees for bioretention
- Utilize the guidelines for tree plantings within the proposed wetland mitigation areas as previously submitted by the MCWA to TDEC.

- Meet Metro Nashville's landscape ordinance to include street tree planting, parking lot requirements for landscape areas and trees, replacement trees for minimum Tree Density requirements, and landscape buffers.

Allowing this development to continue as currently designed sets a precedent that altering a stream headwater source is permissible and encouraged. Please do not allow this kind of precedent to be set.

Sincerely,



Micah Hargrove
Director

Mill Creek Watershed Association
millcreekwatershedassociation@gmail.com